

## **EXHIBIT J**

**Videotaped Deposition of**  
**Elizabeth Tzetzo**  
**March 15, 2023**

**Freeman**

**VS.**

**Deebs**

**Confidential**



## Elizabeth Tzetzo

Confidential

## Freeman vs. Deebs

**Confidential****Freeman vs.  
Deebs****Elizabeth Tzeto**

1 -----x

2 \*\*\*CAPTION CONTINUED\*\*\*

3 HOLTZBRINCK PUBLISHERS, LLC

4 D/B/A MACMILLAN, a New York

5 limited liability company,

6 and UNIVERSAL CITY STUDIOS, LLC,

7 a Delaware limited liability company,

8 Defendants.

9 -----x

10 VIDEOTAPED TELECONFERENCE STENOGRAPHIC  
11 DEPOSITION of ELIZABETH TZETZO, taken in the  
12 above-entitled matter before RICHARD GERMOSEN, Fellow of  
13 the Academy of Professional Reporters, Certified Court  
14 Reporter, (License No. 30XI00184700), Certified Realtime  
15 Court Reporter-NJ, (License No. 30XR00016800),  
16 California Certified Shorthand Reporter, (License No.  
17 14391), NCRA/NY/CA Certified Realtime Reporter, NCRA  
18 Registered Diplomate Reporter, New York Association  
19 Certified Reporter, NCRA Realtime Systems Administrator,  
20 taken at the offices of REITLER KAILAS & ROSENBLATT LLP,  
21 885 Third Avenue, New York, New York 10022, on  
22 Wednesday, March 15, 2023, commencing at 10:12 a.m.

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**Confidential****Freeman vs.  
Deebs****Elizabeth Tzeto**

1 A P P E A R A N C E S:

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4 DONIGER / BURROUGHS APC

5 BY: STEPHEN M. DONIGER, ESQ.

6 603 Rose Avenue

7 Venice, California 90291

8 (310) 590.1820

9 stephen@donigerlawfirm.com

10 Attorneys for the Plaintiff

11

12 COWAN DeBAETS ABRAHAMS &amp; SHEPPARD LLP

13 BY: NANCY E. WOLFF, ESQ.

14 -and-

15 BY: CECE COLE, ESQ., (Via Zoom)

16 41 Madison Avenue

17 38th Floor

18 New York, New York 10010

19 (212) 974.7474

20 ccole@cdas.com

21 nwolff@cdas.com

22 Attorneys for the Defendants,

23 Tracy Deebs-Elkenaney P/K/A Tracy Wolff; Entangled

24 Publishing, LLC, Holtzbrinck Publishers, LLC, D/B/A

25 Macmillan; Universal City Studios, LLC

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4 ALSO PRESENT:

5 JASON DUBINSKI, Legal Video Specialist

6 WENDY SZYMANSKI, ESQ., Macmillan

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1 previously marked as exhibit 55. It's a copy of the  
2 distribution agreement, the original distribution  
3 agreement for 2013 between Entangled and Macmillan.

4 Have you seen this document before?

5 A. I have.

6 Q. All right. And do I understand  
7 correctly that pursuant to the terms of this  
8 agreement, Macmillan is the exclusive distributor  
9 for Entangled?

10 A. Yes.

11 ATTORNEY WOLFF: Object to the form.

12 You can answer.

13 THE WITNESS: Okay.

14 ATTORNEY WOLFF: You can answer.

15 A. Yes, we are the exclusive  
16 distributor.

17 BY ATTORNEY DONIGER:

18 Q. All right.

19 And, in fact, under grant -- I'm just  
20 reading the first sentence. It says: By entering  
21 into this agreement, the publisher grants Macmillan  
22 for the term of this agreement the exclusive right  
23 to distribute throughout the world all print books  
24 and e-books that are published or scheduled for  
25 publication by the publisher during the term of this

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1 BY ATTORNEY DONIGER:

2 Q. As you sit here today, do you know  
3 the total amount paid to Entangled in connection  
4 with the first four books of the Crave series? Paid  
5 by Macmillan?

6 A. Paid by Macmillan? No, I only know  
7 the sales -- total sales numbers.

8 Q. Okay. Does Macmillan have any  
9 knowledge or information about the creation of the  
10 Crave series books?

11 A. No.

12 Q. Okay. Anything that it knows it  
13 would have just been told by Entangled or the  
14 author?

15 ATTORNEY WOLFF: Object to form.

16 You can answer, if you understand.

17 A. No, we're not involved in the  
18 acquisition of the books.

19 Q. Okay. So there is -- and just to be  
20 clear, to the best of your knowledge, as a  
21 representative of Macmillan, no one at Macmillan has  
22 had any involvement in the creation of any of the  
23 Crave books or storylines; is that right?

24 A. Correct.

25 Q. Going back to exhibit 76, it -- we

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1 C E R T I F I C A T E  
2  
3 I, RICHARD GERMOSEN, Fellow of the  
4 Academy of Professional Reporters, stenographic New  
5 Jersey Certified Court Reporter, New Jersey Certified  
6 Realtime Court Reporter, California Certified  
7 Shorthand Reporter, California Certified Realtime  
8 Reporter, NCRA Registered Diplomate Reporter, and  
9 NCRA Certified Realtime Reporter, do hereby certify:

13 I further certify that I am not related  
14 to any of the parties to this action by blood or  
15 marriage, and that I am in no way interested in the  
16 outcome of this matter.

17 IN WITNESS WHEREOF, I have hereunto set  
18 my hand this 20th day of March 2023.



21 RICHARD GERMOSEN,  
FAPR, RDR, CRR, CCR-NJ, CRCR, CSR-CA, CCRR-CA,  
NYACR, NYRCR  
22 LICENSE NO. 30XI00184700  
LICENSE NO. 30XR00016800  
23 California CSR No. 14391  
California CRR No. 198

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Elizabeth Tzeto

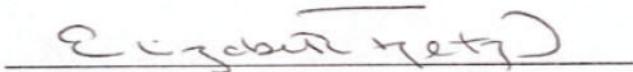
## 1 DECLARATION UNDER PENALTY OF PERJURY

2 Case Name: Freeman vs. Deebs

3 Date of Deposition: 03/15/2023

4 Job No.: 10115789

5

6 I, ELIZABETH TZETZO, hereby certify  
7 under penalty of perjury under the laws of the State of  
8 New York that the foregoing is true and correct.9 Executed this 21<sup>st</sup> day of  
10 April, 2023, at 3:37.11  
12  
13 

14 ELIZABETH TZETZO

15  
16 NOTARIZATION (If Required)

17 State of \_\_\_\_\_

18 County of \_\_\_\_\_

19 Subscribed and sworn to (or affirmed) before me on  
20 this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_,  
21 by \_\_\_\_\_, proved to me on the  
22 basis of satisfactory evidence to be the person  
23 who appeared before me.

24 Signature: \_\_\_\_\_ (Seal)

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